



Sullivan & Worcester LLP
One Post Office Square
Boston, MA 02109

T 617 338 2800
F 617 338 2880
www.sandw.com

June 14, 2006

**By Electronic Court Filing and
First-Class Mail**

Honorable Reginald C. Lindsay
United States District Court for the
District of Massachusetts
John Joseph Moakley U.S. Courthouse
1 Courthouse Way - Suite 2300
Boston, Massachusetts 02210

Re: **Iron Mountain Incorporated, et al. v. Thomas Carr v.**
Iron Mountain Incorporated, et al., U.S.D.C. (D. Mass.), No. 05-10890-RCL
and
Iron Mountain Information Management, Inc. v. Systrans Freight Systems,
Inc., U.S.D.C. (D. Mass.), No. 05-1999-RCL

Dear Judge Lindsay:

We have received a copy of Mr. McCaffrey's June 7, 2006, letter to your chambers.

As indicated in that letter, Mr. McCaffrey's office has notified me that his clients, Thomas Carr and Systrans Freight Systems, Inc., will not agree to the appointment of a discovery master because they are unwilling to participate in the sharing of costs. The refusal of Mr. McCaffrey's clients to agree to share the costs of a discovery master presumably moots the issue, as the Plaintiffs are unwilling voluntarily to bear all of those costs themselves. Nonetheless, I do want to make clear that the Plaintiffs remain fully prepared to agree to the appointment of a discovery master (which they regard as a useful and efficient means of dealing with the discovery issues that may arise in this case) based upon a fair and equitable apportionment of any costs.

As Mr. McCaffrey's office was informed, I was out of the office at the time of Mr. McCaffrey's notification of his clients' unwillingness to agree to a discovery master. I had understood that the Court wished to be informed only if the parties had agreed to appointment of a discovery master and the sharing of costs. In view of Mr. McCaffrey's clients' unwillingness to proceed under such an arrangement, we had assumed that our clients' position on this matter was not relevant. We hope that this letter dispels any confusion.

Sincerely,

/s/ Samuel A. Miller
BBO No. 648568
Direct line: 617 338 2435
smiller@sandw.com

cc: Read K. McCaffrey, Esq. (by facsimile and first-class mail)